THE STOLAR PARTNERSHIP

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RECEIVED

April 6, 1992

APR 07 1992

RCOM SECTION

VIA FEDERAL EXPRESS

Mr. Ruben B. McCullers
Environmental Scientist
RCRA Compliance
United States Environmental
Protection Agency, EPA Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

Re: In the Matter of The Knapheide Manufacturing Co., West Quincy, Missouri, EPA Docket No. VII-92-H-0008

Dear Mr. McCullers:

Please find enclosed for review and approval a Closure Plan submitted on behalf of Knapheide Mfg. Co. ("Knapheide") in accordance with Paragraph 57(b) of the Complaint, Compliance Order and Notice of Opportunity for Hearing (the "Complaint") issued in the above-referenced proceeding. The Closure Plan was prepared by ATEC Associates, Inc. and addresses the waste paint filters and overspray paper storage area and the area surrounding the Brule incinerator, as the Complaint requires.

We are ready to schedule a second settlement conference with you, Mr. Richards, and other appropriate officials at the EPA's convenience. We think it would be helpful to be able to discuss at that time any comments you or the Missouri Department of Natural Resources may have regarding the Closure Plan, and therefore suggest that the meeting be scheduled after such review. We are, however, prepared to meet at an earlier time if you and Mr. Richards deem it appropriate.

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Knapheide's compliance with Paragraph 57(b) of the Complaint does not constitute an admission by Knapheide of any of the specific factual allegations or legal conclusions contained in the Complaint. Further, Knapheide reserves the right to assert any and all defenses it may have to said allegations and to dispute the appropriateness of any other element of the Complaint.

Very truly yours,

Sandra L. Oberkfell
Sandra L. Oberkfell

SLO: 1ml

Enclosures

cc: Mr. Bruce Martin (w/ encl.)

Robert W. Richards, Esq. (w/o encl.)

Mr. Harold Huggins (w/encl.)
Mr. Steve Townsend (w/o encl.)